

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF INDIANA  
NEW ALBANY DIVISION

IN RE:	)	
	)	Case No. 10-93904-BHL-11
EASTERN LIVESTOCK CO., LLC,	)	Chapter 11
	)	
Debtor.	)	Hon. Basil H. Lorch III
	)	
_____	)	
JAMES A. KNAUER, CHAPTER 11	)	
TRUSTEE OF EASTERN LIVESTOCK	)	
CO., LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Adversary Proceeding No. 12-59161
	)	
STOCKMAN OKLAHOMA LIVESTOCK	)	
MARKETING, INC., SOUTHEAST	)	
LIVESTOCK EXCHANGE, LLC,	)	
ROBERT NICHOLS, individually,	)	
ROBERT and JANE NICHOLS d/b/a	)	
NICHOLS LIVESTOCK, NICHOLDS	)	
LIVESTOCK, INC., WILLIAM BUSH,	)	
and DOES 1-16, EASTERN LIVESTOCK	)	
CO., LLC,	)	
	)	
Defendants.	)	
	)	
v.	)	
	)	
EASTERN LIVESTOCK CO., LLC, et al,	)	
	)	
Defendants.	)	
_____	)	

**STOCKMAN OKLAHOMA LIVESTOCK  
MARKETING, LLC'S NOTICE OF DEPOSITION  
PURSUANT TO RULE 30(b)(6) OF JAMES A. KNAUER,  
TRUSTEE OF EASTERN LIVESTOCK CO., LLC**

Please take notice that Stockman Oklahoma Livestock Marketing, Inc. ("SOLM") will conduct the deposition of James A. Knauer, Chapter 11 Trustee (the "Trustee") of Eastern Livestock Co., LLC ("Eastern") on April 28, 2014 at the offices of Faegre Baker Daniels LLP,

300 N. Meridian Street, Suite 2700, Indianapolis, Indiana, beginning at 9:00 a.m. The deposition will be taken before a court reporter authorized to administer oaths and will be recorded by stenographic means.

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure and Bankruptcy Rule 7030, the Trustee is requested to designate one or more persons who consent to testify on behalf of the Trustee regarding the following topics of inquiry:

1. Historical business practices of Eastern relating to the purchase and sale of cattle and payment procedures with respect thereto.

2. The general and/or historical course of dealing of Eastern with SOLM.

3. Cattle purchases by Eastern from SOLM during the 90 days preceding the commencement of the bankruptcy case of Eastern.

4. Payments by Eastern to SOLM during the 90 days preceding the commencement of the bankruptcy case of Eastern and, to the extent not encompassed by paragraph 3, all cattle purchases for which such payments were made.

5. All transactions referenced in Exhibit C to the First Amended Complaint.

6. All transactions referenced in Exhibit D to the First Amended Complaint.

7. The assignment attached as Exhibit E to the First Amended Complaint and all contracts referenced therein or subject thereto.

8. The assignment attached as Exhibit F to the First Amended Complaint and all contracts referenced therein or subject thereto.

9. All communications between SOLM, on the one hand, and Elizabeth Lynch and/or Development Specialists, Inc. as receiver of Eastern (the "Receiver"), on the other,

regarding all outstanding contracts (or contracts claimed to be outstanding) between SOLM (and/or its customers) and Eastern.

10. All communications between SOLM, on the one hand, and the Trustee, on the other, regarding all outstanding contracts (or contracts claimed to be outstanding) between SOLM (and/or its customers) and Eastern.

11. All allegations and claims contained in the First Amended Complaint relating to SOLM.

12. The appointment of the Receiver and the facts and circumstances relating to the implementation of the receivership and the takeover of control of the business of Eastern by the Receiver.

13. The assets, liabilities and finances of Eastern at the time of the appointment of the Receiver and thereafter until the commencement of the bankruptcy case.

14. Any analysis by the Trustee and/or the receiver regarding alleged preferential payments made by Eastern to SOLM, including any analysis of the ordinary course of business between Eastern and SOLM, and subsequent new value extended by SOLM to Eastern, and any contemporaneous exchanges that might related to any alleged preferential payments to SOLM by Eastern.

15. All transactions between Eastern and William Bush during calendar year 2010.

16. Any checks or other evidences of payment by Eastern to SOLM and/or William Bush that were marked “refer to maker” and returned for nonpayment by Eastern’s bank in October and November, 2010.

Respectfully submitted,

/s/ Ross A. Plourde

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 22, 2014, a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

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